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REMARKS

Claims 1-31 remain pending in this application for which applicants seek reconsideration.

Amendment

Independent claims 1, 11, 21, 27, 30, and 31 all have been amended to improve their form, namely deleting the language "capable of." No new matter has been introduced.

Art Rejection

Claims 1-31 were rejected under 35 U.S.C. § 102(b)[1] as anticipated by Namikawa (USP 6,094,698). Applicants traverse this rejection because Namikawa would not have disclosed or taught the first storage means and the write control feature set forth in independent claims 1, 11, 21, 27, 30, and 31.

Independent claims 1, 11, 21, 30, and 31 call for first storage means (e.g., EPROM 503) storing the first control program, the second control program, and the write control program. These claims further call for write controlling, where the write control program is transferred to the second CPU (e.g., 601), causing the second CPU to write the second control program stored in the first storage means to the second storage means (e.g., 603). Independent claim 27 is similar, but does not explicitly call for a write control program.

Namikawa discloses updating a program from a ROM 13 to a first flash memory 2 of a facsimile device F or a second flash memory 22 of an external device G1-Gn. See column 9, lines 14 to 40. Namikawa's ROM 13, however, stores only updated version of the program. Namikawa stores the write control program in the first mask ROM 11, the first control program in the first and second flash memories 2 and 22, and the second control program in the ROM 13. In contrast, the claims (1, 11, 21, 30, and 31) call for storing all three programs in a single storage means. In the write control mode, the second CPU receives the write control program from the first storage means and writes the second control program stored in the first storage means to the second storage means. Namikawa needs one storage (ROM 11) for storing the write control program, and another storage for storing the control programs for operating the CPUs, in addition to an external storage (ROM 13).

Regarding claims 3 and 13, in Namikawa, the ROM 13 that stores only the program of updated version is removable from the apparatus. As previously mentioned, the ROM 13 does

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[1]   Namikawa issued 25 July 2000, which is more than one year before the U.S. filing date of this
       application.

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not store the write control program. Rather, the first mask ROM 11, which is different from the ROM 13, stores the write control program. On the other hand, claims 3 and 13 call for the first storage means, which stores the first and second control programs and the write control program, to be removable from the apparatus. Therefore, claims 3 and 13 further distinguishes over Namikawa.
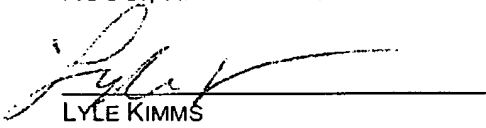
Conclusion

Applicants submit that claims 1-31 patentably distinguish over Namikawa and are in condition for allowance. Should the examiner have any issues concerning this reply or any other outstanding issues remaining in this application, applicants urge the examiner to contact the undersigned to expedite prosecution.

Respectfully submitted,

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08 JULY 2005
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